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Attorneys for Defendants

VXN GROUP LLC; STRIKE 3 HOLDINGS, LLC;

GENERAL MEDIA SYSTEMS, LLC; and

MIKE MILLER

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

MACKENZIE ANNE THOMA, a.k.a. KENZIE ANNE, an individual and on behalf of all others similarly situated,

Plaintiff,

v.

VXN GROUP LLC, a Delaware limited liability company; STRIKE 3 HOLDINGS, LLC, a Delaware limited liability company; GENERAL MEDIA SYSTEMS, LLC, a Delaware limited liability company; MIKE MILLER, an individual; and DOES 1 to 100, inclusive,

Defendants.

Case No. \_\_\_\_\_

**DECLARATION OF BELEN  
BURDITTE IN SUPPORT OF  
DEFENDANT'S NOTICE OF  
REMOVAL**

[Los Angeles County Superior Court Case  
No. 23STCB08761]

**DECLARATION OF BELEN BURDITTE**

I, Belen Burditte, declare and state as follows:

1. I am over the age of eighteen years and am fully competent to make this declaration. The facts contained herein are based on my personal knowledge and are true and correct.

2. I am the Production Accountant for VXN Group, LLC (“VXN”). I have been employed in this position since VXN began doing business in California in January 2020. In that capacity, I have knowledge of the date on which VXN began doing business and began paying actors. The first date that VXN began paying actors for services rendered in California was January 7, 2020.

2. I have been a Production Accountant in the film industry for over 20 years and have worked both in the mainstream film industry as well as the adult film industry.

3. In my capacity as a Production Accountant, I have access to accounting records for all payments made to Plaintiff Mackenzie Thoma (“Plaintiff”) and other actors who performed services for VXN in the State of California between January 7, 2020, and the present. These records are kept and maintained by VXN in the ordinary course of business. I have reviewed accounting records related to payments made to Plaintiff and other actors in connection with acting services rendered on films produced by VXN.

5. Based on my review of VXN’s accounting records, from January 7, 2020, to May 8, 2023:

a. Type-I films produced by VXN accounted for a total of one thousand one hundred and twenty (1,120) separate actors engagements (“Type-I Actor Engagements”).

b. Actors on Type-I films are paid on a per-film basis. The average per-film rate paid to actors on Type-I films during this time period was \$1,579.65.

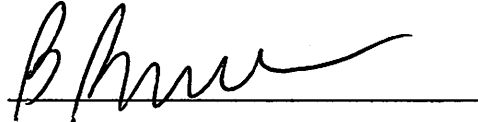
6. Based on my review of VXN’s accounting records, from April 20, 2020, to May 8, 2023:

- a. Type-I films produced by VXN accounted for a total of one thousand and one (1,001) separate Type-I Actor Engagements.
- b. The average daily rate paid to actors on Type-I films during this time period was \$1,603.18.

7. Based on my review of VXN's accounting records, Mackenzie Anne Thoma's average daily rate of pay on Type-I films was \$4,875.00.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 20 day of June, 2023, at Los Angeles, CA

  
Belen Burditte

KANE LAW FIRM  
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Los Angeles, CA 90035

**PROOF OF SERVICE**  
CCP 1013a(3)

I am employed in the County of Los Angeles of California. I am over the age of 18 and not a party to the within action. My business address is 1154 S. Crescent Heights Blvd., Los Angeles, CA 90035.

On June 21, 2023, I served the foregoing document(s) described as:

**DECLARATION OF BELEN BURDITTE IN SUPPORT OF DEFENDANTS' NOTICE OF REMOVAL** on each interested party in this action, as follows:

BIBIYAN LAW GROUP, P.C.  
David D. Bibiyan  
Jeffrey D. Klein  
Alexander D. Wallin  
8484 Wilshire Blvd., Suite 500  
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*Attorneys for Plaintiff Mackenzie Thoma*

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☒ **BY USPS FIRST CLASS MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon fully prepaid at Santa Monica, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

☒ **BY EMAIL TO ALL PARTIES** (pursuant to California Code of Civil Procedure § 1010.6): I caused a true copy of the foregoing document(s) to be served by electronic email transmission at the time shown on each transmission, to each interested party at the email address shown above. Each transmission was reported as complete and without error.

☒ **FEDERAL** - I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 21, 2023, at Los Angeles, California.

  
Chris Cude